

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons Walter Salzman to appear within thirty days from the service of this writ in the Circuit Court to be held for said County at the place of holding the same, then and there to answer the Complaint of Harold C. Hayes.

Witness my hand, this the 1 day of ^{Dec} November, 1971.

Eunice B. Blackmon
Eunice Blackmon, Clerk

HAROLD C. HAYES, X)
Plaintiff, X IN THE CIRCUIT COURT OF
Vs. X BALDWIN COUNTY, ALABAMA
WALTER SALZMAN, X AT LAW
Defendant. X CASE NO. 10,135

1.

Plaintiff claims of the Defendant the sum of ONE THOUSAND \$(1,000.00) DOLLARS as damages for that heretofore on, to-wit: the 4th day of December, 1970, in front of the Huguen's Gulf Service Station, at the Northwest intersection of Highway #90 and Baldwin County Alabama Road #64, in the town of Loxley, Baldwin County, Alabama, at a point where the Plaintiff's wife had a right to be in his motor vehicle, at which time and place the Defendant negligently drove his motor vehicle into the rear of the Plaintiff's car and as a direct proximate result of the negligence aforesaid, the Plaintiff's motor vehicle was bent and damaged about the rear and damaged the left back fender and bumper; that his damage was the proximate result of the negligence of the Defendant.

2.

Plaintiff claims of the Defendant the sum of FIVE THOUSAND (\$5,000.00) DOLLARS as damages, for that heretofore on, to-wit: the 4th day of December, 1970, in front of the Huguen's Gulf Ser-

vice Station, at the Northwest intersection of Highway #90 and Baldwin County Alabama Road #64, in the town of Loxley, Baldwin County, Alabama, at a point where the Plaintiff's wife had a right to be in his motor vehicle, at which time and place the Defendant negligently drove his motor vehicle into the rear of the Plaintiff's car and as a direct proximate result of the negligence aforesaid, the Plaintiff's wife received several personal injuries in that, to-wit: Her physical being was shaken and shocked, and she was made sick and sore and was caused to suffer great mental and physical anguish; her neck and back were severely bruised and sprained; and Plaintiff avers that as a proximate result and consequence of the injury to his wife, the Plaintiff was caused to incur considerable expense for Medical and Doctor bills in and about the treatment of his wife and will probably have to incur further expenses in the future and the Plaintiff lost and continues to lose the social consortium and services of his wife, all of which he claims damage, hence his suit.

WILTERS & BRANTLEY

BY: 

Attorney for the Plaintiff

Service of process may be had upon the Secretary of State of the State of Alabama, by authority of Title 7, Section 199, Code of Alabama as recompiled in 1958.

Defendant's address is:

Feasterville, Pennsylvania

FILED

DEC 1 1971

EUNICE B. BLACKMON CIRCUIT CLERK

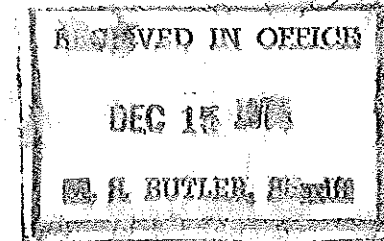
Case 10,135

Harold C. Hayes
vs

Walter Selzman

DEC 13 1971

TAYLOR A. CUNNINGHAM
SHERIFF



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Executed by serving 3 copies of
the within on M. Amos
Secretary of State of The State of
Alabama.

Was the 17 day of Dec 19 71

Sheriff of Montgomery County

M. S. Butler,

By McNath D. E.

M. S. Butler, Sheriff of Montgomery
County, Alabama, Claim \$1.50 each for
serving 1 process(es) and \$1.00
travel expense on each of 1
process(es), or a total of 2.50

Harry H. Wilkins Jr

McNath Deputy Sheriff